

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NYDIA PEREZ,

:

Plaintiff,

:

07 Civ. 8446 (LAP) (MHD)

- against -

:

**DEFENDANT'S RULE 26
DISCLOSURE STATEMENT**

JPMORGAN CHASE BANK, N.A.,

:

Defendant.

:

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Defendant JPMorgan Chase Bank, N.A. (the "Bank" or "JPMorgan Chase"), by its attorneys, JPMorgan Chase Legal and Compliance Department, Frederic L. Lieberman, Assistant General Counsel, as and for its disclosure pursuant to Fed. R. Civ. P. 26, asserts as follows:

A. The name and, if known, the address and telephone number of each individual other than Plaintiff likely to have discoverable information that the disclosing party may use to support its claims or defenses:

NameAddress

Clarence Mosley

c/o JPMorgan Chase Legal and Compliance Department, 1 Chase
Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-
1815

Ruth Salzman

c/o JPMorgan Chase Legal and Compliance Department, 1 Chase
Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-
1815

Steven Fiata

c/o JPMorgan Chase Legal and Compliance Department, 1 Chase
Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-
1815

Harrison Fisher

c/o JPMorgan Chase Legal and Compliance Department, 1 Chase
Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-
1815

Frank Fogli	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815
Miriam Negron	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815
Michael Rehberg, Kazi Khan, Sam Hassouna and/ or Tina Tiotis	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815
Barbara Hart	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815
Kellie Novack	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815

Clarence Mosley is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during portions of the relevant time period, the employment, performance and job responsibilities of other persons under his management and supervision during portions of the relevant time period, of the reorganization and/or elimination of the Business Resource Group in 2005, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Ruth Salzman is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during portions of the relevant time period, the employment, performance and job responsibilities of other persons under his management and supervision during portions of the relevant time period, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Steven Fiata is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during portions of the relevant time period, the employment, performance and job responsibilities of other persons under his management and supervision during portions of the relevant time period, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Harrison Fisher is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during portions of the relevant time period, the employment, performance and job responsibilities of other persons under his management and

supervision during portions of the relevant time period, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Frank Fogli is likely to have knowledge of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Miriam Negron is likely to have knowledge of various events referred to in Plaintiff's Complaint, of relevant JPMorgan Chase policies and procedures in effect during the relevant time period, and of Plaintiff's compliance with relevant JPMorgan Chase policies.

Michael Rehberg, Kazi Khan, Sam Hassouna and/ or Tina Tiotis are likely to have knowledge of the analysis of the feasibility of using, and the decision not to approve the use of, voice-activated software.

Barbara Hart is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during portions of the relevant time period, of the reorganization and/or elimination of the Business Resource Group in 2005, of various events referred to in Plaintiff's Complaint of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Kellie Novack is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during portions of the relevant time period, of various events referred to in Plaintiff's Complaint of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

B. Documents, data compilations, and tangible things that the disclosing party may use to support its claims and defenses:

- Plaintiff's employee records file, if any;
- Plaintiff's AccessHR file, if any;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Human Resources Department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Retail Financial Services Business Banking department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by any individual JPMorgan Chase manager or supervisor regarding Plaintiff;

- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Retail Financial Services Business Banking department concerning the reorganization and/or elimination of the Business Resource Group;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Health Services Department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Employee Relations Department concerning Plaintiff;
- Relevant documents and/or files, if any, concerning the use of voice-activated software;
- Relevant JPMorgan Chase policies, plans, and programs; and
- Relevant documentary communications, if any, whether in letter, memorandum, email, or other format.

C. The provisions of Fed. R. Civ. P. 26(a)(1)(C) are not applicable because Defendant is not seeking damages at this time from Plaintiff.

D. Defendant is investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement its response as appropriate.

RESERVATION OF RIGHTS

Defendant reserves its right to supplement and/or amend its Rule 26 Disclosure Statement if and when it deems it appropriate.

Dated: January 10, 2008

**JPMORGAN CHASE LEGAL AND
COMPLIANCE DEPARTMENT**

By: 

Frederic L. Lieberman, Esq.

Attorneys for Defendant

One Chase Manhattan Plaza, 26th Floor

New York, New York 10081

(212) 552-1815

frederic.l.lieberman@jpmchase.com

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White Plains, New York 10601
(914) 682-0257

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NYDIA PEREZ, :

Plaintiff, : 07 Civ. 8446 (LAP) (MHD)

- against - : **AFFIDAVIT OF SERVICE**

JPMORGAN CHASE BANK, N.A., :

Defendant. :

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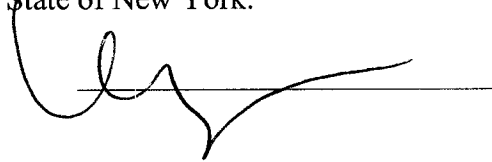
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Marlene Thompson, being duly sworn, deposes and says, that deponent is not a party to the action, is over eighteen years of age and is employed by JPMorgan Chase Bank, N.A., and that on the 10th day of January, 2008, deponent served the within:

DEFENDANT'S RULE 26 DISCLOSURE STATEMENT

To: Saul L. Glass, Esq.
Law Offices of Saul L. Glass
One Barker Avenue, Suite 425
White Plains, New York 10601

by the address designated for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.



Sworn to before me this
10th day of January 2008



Notary Public
STUART RADISH
Notary Public, State of New York
No. 01RA6115435
Qualified in New York County
Commission Expires September 7, 2008